

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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DEKESHIA ANDERSON	:	CIVIL ACTION
Plaintiff,	:	
v.	:	DOCKET NO.: 13-3716
KENCREST SERVICES	:	
Defendant.	:	
	:	

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**MOTION FOR SUMMARY JUDGMENT AS TO DEFENDANT KENCREST SERVICES  
PURSUANT TO FED. R. CIV. P. 56**

Defendant, KenCrest Services, hereby moves for summary judgment. As established in the supporting Memorandum of Law Plaintiff's claims against Defendant should be dismissed because she cannot establish *prima facie* claims of discrimination brought pursuant to the Americans With Disabilities Act and the Family Medical Leave Act or common law wrongful discharge.

WHEREFORE, Defendant KenCrest Services, respectfully moves for summary judgment based upon Fed. R. Civ. P. 56 .

Respectfully submitted,

**SALMON, RICCHEZZA, SINGER & TURCHI LLP**

By: /s/ Michele L. Weckerly

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KenCrest Services*

Dated: 12/27/13